

HEATHER E. WILLIAMS, SBN #122664
Federal Defender
HANNAH LABAREE, # 294338
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax 916-498-5710
Attorneys for Defendant
ROBERT ALLEN POOLEY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00111-WBS-1
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE STATUS CONFERENCE, AND TO
vs.)	EXCLUDE TIME
)	
ROBERT ALLEN POOLEY)	Date: October 3, 2022
)	Time: 9:00 a.m.
Defendant.)	Judge: Hon. William B. Shubb
)	

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, Acting United States Attorney Phillip Talbert, through Assistant United States Attornies Christopher Stanton Hales and Katherine Theresa Lydon, attorneys for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree, attorney for defendant Robert Allen Pooley, that the previously-scheduled status conference date of October 3, 2022, be vacated and the matter be set for status conference on December 12, 2022 at 9:00 a.m, at the defendants' request.

To date, the government has produced over 19,000 individual Bates-stamped items, with additional discovery amounting to over 6 terabytes of data available for further production and inspection. Most recently, the government has prepared a subset of discovery to assist the defense in its review of the most salient material. Counsel for the defendant requires time to review discovery, conduct independent investigation, and meet with their client.

1 For all these reasons, Defense counsel believe that the failure to grant the above-
2 requested continuance would deny them the reasonable time necessary for effective preparation,
3 taking into account the exercise of due diligence.

4 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
5 excluded from this order's date through and including December 12, 2022, pursuant to 18 U.S.C.
6 §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,
7 based upon continuity of counsel and defense preparation.

8 Counsel and the defendant also agree that the ends of justice served by the Court granting
9 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

10 Respectfully submitted,

11 Dated: September 27, 2022

HEATHER E. WILLIAMS
Federal Defender

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13 /s/ Hannah Labaree
HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
ROBERT ALLEN POOLEY

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15
16 Dated: September 27, 2022

PHILLIP A. TALBERT
United States Attorney

17
18 /s/Christopher Stanton Hales
CHRISTOPHER STANTON HALES
Assistant U.S. Attorney
Attorney for Plaintiff

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20 /s/Katherine Theresa Lydon
KATHERINE THERESA LYDON
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including December 12, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the October 3, 2022 status conference shall be continued until December 12, 2022, at 9:00 a.m.

Dated: September _____, 2022

Hon. William B. Shubb
United States District Judge